



March 21, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Bridging the Digital Divide for Low-Income Consumers
WC Docket No. 17-287
Notice of Oral Ex Parte Communication

Dear Ms. Dortch:

On March 11, 2019, John Willis, COO of i-wireless, LLC DBA Access Wireless; Sam Bailey, Director of Compliance of i-wireless, LLC DBA Access Wireless; Matthew Perin, Head of Government Relations and Regulatory Affairs of The Kroger Co.; and Ari Storch, Partner of the Madison Group and consultant to i-wireless, met with Chairman Ajit Pai and Nirali Patel, Wireline Advisor to the Chairman to discuss matters related to the above-referenced proceeding.

The i-wireless/Kroger representatives discussed the need of the Commission to instill program integrity protocols into the Lifeline program in order to ensure its efficacy and to protect the long-term benefits the program provides to both urban and rural Americans. The i-wireless/Kroger representatives discussed how i-wireless has instituted its own program integrity protocols designed to protect the program and its participants beyond the requirements of the Lifeline program rules.

The i-wireless/Kroger representatives specifically asked the Commission in its rulemaking to reinstitute a 60-day port freeze that would, in their opinion, add a layer of program integrity that would help protect the National Verifier from abuse. In addition, the i-wireless/Kroger representatives specifically asked the Commission to allow for the National Verifier to develop an API for efficient exchange of the application data. Finally, the i-wireless/Kroger representatives asked the Commission to freeze the current minimum service standards at their current state until such time as the Commission can examine the economic feasibility of evolving the minimum standards.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed in ECFS in the above-referenced docket.

Respectfully submitted

/s/ Ari Storch
Partner, The Madison Group